

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Thomas F. Quinn, Esq. (Attorney ID 016211981)

Joanna Piorek, Esq. (Attorney ID 005342001)

200 Campus Drive

Florham Park, New Jersey 07932

Tel: (973) 624-0800

Fax: (973) 624-0808

**Attorneys for Defendant JOHN INGLESINO, in his individual capacity and official capacity
as Morristown's Special Counsel**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SPEEDWELL, LLC, SPEEDWELL ASSOCIATES
NO. 1, LP AND SPEEDWELL ASSOCIATES NO. 4,
LP,

Plaintiffs,

v.

TOWN OF MORRISTOWN; TIMOTHY
DOUGHERTY, in his individual capacity and official
capacity as Mayor of Morristown; TOPOLOGY NJ,
LLC; PHIL ABRAMSON, in his individual capacity and
official capacity as Morristown's Town Planner; JOHN
INGLESINO, in his individual capacity and official
capacity as Morristown's Special Counsel;
MORRISTOWN DEVELOPMENT, LLC;
MORRISTOWN URBAN RENEWAL PHASE II, LLC;
and JOHN DOES 1-10,

Defendants.

Civil Action No. 2:21-cv-18796-JXN-CLW

**SUPPLEMENTAL NOTICE AND
CONFIRMATION OF CONSENT AND
JOINDER TO NOTICE OF REMOVAL**

(Document Filed Electronically)

TO: Honorable Julien Xavier Neals, U.S.D.J.

PLEASE TAKE NOTICE THAT:

1. Defendant JOHN INGLESINO, in his individual capacity and official capacity as Morristown's Special Counsel ("Inglesino"), hereby confirms that Mr. Inglesino previously consented to the removal of this matter by Defendants Town of Morristown, Timothy Dougherty, Topology NJ, LLC, and Phil Abramson (collectively, the "Town

Defendants”) prior to the Town Defendants’ removal of this matter to this Court consistent with 28 U.S.C. §1446(b).

2. On November 5, 2021, on behalf of Mr. Inglesino, the undersigned counsel, filed a Notice and Confirmation of Consent and Joinder to Notice of Removal before this Court.
3. That Notice confirmed that counsel for Mr. Inglesino notified the Town Defendants’ counsel of Mr. Inglesino’s consent as to removal of the action – representations as to consent provided verbally on September 9, 2021 during a conference amongst defense. Mr. Inglesino’s consent was confirmed by counsel for the Town Defendants in his email of September 24, 2021, a true copy of which was attached to the November 5, 2021 Notice as Exhibit A thereto.
4. The undersigned counsel for Mr. Inglesino submitted the November 5, 2021 Notice, which was filed on the same day as Mr. Inglesino’s responsive pleading was due, as further confirmation of Mr. Inglesino’s consent to removal.
5. Presently, the undersigned counsel for Mr. Inglesino wishes to supplement Mr. Inglesino’s November 5, 2021 Notice with a September 15, 2021 email from Thomas F. Quinn, Esq., as counsel for Mr. Inglesino, to all Defendants’ counsel, advising and confirming in writing that Mr. Inglesino consents to removal of this matter, therein further confirming Mr. Inglesino’s previously advised consent as to Removal. A true and accurate copy of Mr. Quinn’s redacted email is attached hereto as Exhibit A.

Respectfully submitted,

WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
*Counsel for Defendant JOHN INGLESINO, in his individual
capacity and official capacity as Morristown’s Special Counsel*

By: s/ Joanna Piorek _____

Dated: November 19, 2021